

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JUAN JOSE SALGUERO, OLVIN RAMON
RODRIGUEZ, ALICIA RIVERIA GARCIA, THANIA
VELASCO, CARLOS ROBERTO GARCIA, and
YOVANY SIFORTES PINTO, on behalf of themselves
and all others similarly situated,

Civil Action No.: 12-CV-0635
(JFB)(AKT)

Plaintiffs,

-against-

JVK OPERATIONS LIMITED, VINOD SAMUEL,
and MICHAEL CONNELL,

Defendants.
-----X

**NOTICE OF PLAINTIFFS' MOTION FOR CERTIFICATION OF THE SETTLEMENT
CLASS, FINAL APPROVAL OF THE CLASS ACTIONS SETTLEMENT,
AND APPROVAL OF THE FLSA SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of the FLSA Class, the Declaration of James W. Versocki in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of the FLSA Class ("Versocki Decl."), and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) granting final certification of the settlement class;
- (2) granting final approval of the Joint Stipulation and Release ("Settlement Agreement"), attached as Exhibit A to the Versocki Decl.;
- (3) granting approval of the FLSA Settlement; and
- (4) granting such other, further, or different relief as the Court deems just and proper.

Plaintiffs have submitted a Proposed Order, attached hereto as Exhibit 1, for the Court's

convenience.

Dated: July 21, 2015
Melville, New York

Respectfully submitted,
ARCHER, BYINGTON, GLENNON & LEVINE, LLP

By: /s/ James W. Versocki
James W. Versocki
Attorneys for Plaintiffs
One Huntington Quadrangle, Suite 4C10
P.O. Box 9064
Melville, New York 11747
631-249-6565
E-mail: jversocki@abgllaw.com

Attorneys for Plaintiffs and the Proposed Class